

Notes from Conference call with EPA HQs on 9/6/2011:

1. Provide additional support regarding the limited movement of the groundwater plume.
2. Clarify ROD language in accordance with guidance.
3. Make the case that the cap is necessary for the remedy.
4. Describe the risk that would result if the plume reached the surface water; the risk can be qualitative instead of quantitative (exceeds surface water quality standards).
5. The cap should meet the requirements for a Subtitle C cover.
6. Provide additional information regarding the 1982 closure of former impoundments.
7. Describe the DNAPL as a principle threat waste, but that it is impracticable to recover/treat it (not mobile, location is not well known, only two wells had DNAPL staining, etc.).
8. Clarify that the RAO is to stop migration of the plume.
9. Clarify that the RAO is to prevent human exposure in future industrial buildings.
10. Follow the general logic needed for a ROD:
 - a. Is there a risk?
 - b. If yes, then state the RAO to address the risk;
 - c. Develop alternatives to address the RAO.
11. Executive Orders are not ARARs by law, but any relevant regulations are.
12. Route ROD to HQs again after making changes.